

John F. Hyland (SBN 178875)
jhyland@rukinhyland.com
RUKIN HYLAND & RIGGIN LLP
1939 Harrison Street, Suite 925
Oakland, California 94612
Telephone: (415) 421-1800
Facsimile: (415) 421-1700

Attorney for Defendant
Foley Family Wines, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IGNACIO GONZALEZ, an individual,

Plaintiff,

v.

FOLEY FAMILY WINES, INC., a Delaware
Corporation,

Defendant.

Case No.

**DECLARATION OF JOHN F. HYLAND
IN SUPPORT OF REMOVAL TO
FEDERAL COURT ON THE BASIS OF
DIVERSITY JURISDICTION**

27 U.S.C. §§ 1332, 1441, 1446

I, John F. Hyland, declare as follows:

1. I am an attorney licensed by the Bar of the State of California. I am a partner in the law firm of Rukin Hyland & Riggins LLP, counsel of record for Defendant Foley Family Wines, Inc. in this action. I have personal knowledge of the matters set forth in this declaration and could competently testify to these matters.

2. Foley Family Wines, Inc. is a Delaware Corporation with its headquarters and principal place of business in Las Vegas, Nevada.

3. I have attached as ***Exhibit A*** a true and correct copy of the summons and complaint served on Foley Family Wines, Inc. on October 23, 2023. As of the date of this declaration, neither Foley Family Wines, Inc. nor our Firm has received service or notice of any additional process, pleadings, or orders filed in this action. After filing the Notice of Removal, our Firm will file with the clerk of the Napa County Superior Court a notice of the removal.

4. I have attached as ***Exhibit B*** a true and correct copy of the answer to the complaint filed on behalf of Foley Family Wines, Inc. in the Napa County Superior Court on November 9, 2023. Our office effected service of the answer on Plaintiff's counsel on November 9, 2023.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and accurate, executed this 13th day of November, 2023, in Petaluma, California.

/s/ John F. Hyland

John F. Hyland